

UNITED STATES DISTRICT COURT  
DISTRICT OF MASSACHUSETTS

_____	)	
PAUL DAVIS,	)	
	)	
Plaintiff	)	
	)	Civil Action No. 04-11851-WGY
v.	)	
	)	
SUFFOLK COUNTY, AND	)	
ANDREA CABRAL (in her official	)	
capacity),	)	
	)	
Defendants	)	
_____	)	

**AFFIDAVIT OF MICHAEL HARRIS**

I, Michael Harris, being duly sworn do hereby depose and state:

1. My name is Michael Harris and I am the Superintendent of Human Resources for the Suffolk County Sheriff's Department.
2. Among my responsibilities as the Superintendent of Human Resources is the maintenance of personnel files for current and former employees, including disciplinary records.
3. Former lieutenant Eric Donnelly was terminated on December 28, 1999.
4. Former lieutenant Randall Sutherland was suspended without pay on May 16, 2001 (when he was indicted by a federal grand jury) and resigned his employment on February 27, 2003.
5. Former Jail Officer Brian Bailey was suspended without pay on May 16, 2001 (when he was indicted by a federal grand jury) and was terminated on April 22, 2003.
6. Former jail officer Michael Ross resigned his employment on May 22, 2000.
7. Former jail officer Anthony Nuzzo was suspended without pay on May 16, 2001 (when he was indicted by a federal grand jury) and resigned his employment on June 26, 2002.

8. Former jail officer Patrick Cook was placed on Administrative Leave without pay on October 21, 2002, was on active military duty as of January 19, 2003 and resigned his employment on January 12, 2004.
9. Jail Officer Thomas Bethune had been suspended without pay as of May 16, 2001 (when he was indicted by a federal grand jury) and was reinstated subsequent to his acquittal at trial. Subsequent to his reinstatement Officer Bethune was suspended for 90 days without pay in September of 2003.
10. Former jail officer Melvin Massucco was suspended without pay on May 26, 2001 (when he was indicted by a federal grand jury) and was terminated on March 12, 2003.
11. Former jail officer Steve Brown resigned his employment on December 15, 2003.

Signed Under The Pains And Penalties Of Perjury This 12<sup>th</sup> Day Of September, 2005

/s/ Michael J. Harris

Michael J. Harris  
Superintendent